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May 3, 2022

VIA ECF

Hon. André M. Espinosa
United States District Court, District of New Jersey
Martin Luther King Jr. Courthouse
50 Walnut Street, Room 2037
Newark, NJ 07102

Re: *Ramirez v. Smart Foods Inc et al.*
Civil Action No. 2:21-cv-12408

Your Honor:

We represent plaintiff Marcelo Ramirez in the above-captioned matter, and write to request leave to withdraw as attorneys pursuant to Local Civil Rule 102.1.

Due to a breakdown in the attorney-client relationship, we and Mr. Ramirez have mutually decided to terminate our representation, and Mr. Ramirez is in the process of seeking new counsel. We therefore also request a 60-day extension of all deadlines (including a stay of depositions currently scheduled for May 6 and May 10, 2022) while Mr. Ramirez procures new representation.

We thank the Court for its attention to this matter.

Sincerely,
/Nicole Grunfeld/
Nicole Grunfeld